EXHIBIT U

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KYLE J. WRIGHT								
DEPO DATE	DESIGNATION TYPE	KILE J. W						
		Begin Page at	Begin Line at	End Page at	End Line at			
2/28/2019	All Def Affirm	12	4	12				
	All Def Affirm	24	8	24				
	All Def Affirm	24	17	24				
	All Def Affirm	25	1	25				
	All Def Affirm	26	13	26				
	All Def Affirm	26	19	26				
	All Def Affirm	27	1	27				
	All Def Affirm	28	1	28				
	All Def Affirm	28	22	28				
	All Def Affirm	29	4	29				
	All Def Affirm	29	16	29				
	All Def Affirm	29	23	29				
	All Def Affirm	30	1	30				
	All Def Affirm	30	19	30				
	All Def Affirm	32	3	32				
	All Def Affirm	32	6	32				
	All Def Affirm	32	21	32				
	All Def Affirm	33	20	33				
	All Def Affirm	34	9	34				
	All Def Affirm	35	13	35				
	All Def Affirm	35	20	35				
	All Def Affirm	35	22	35				
	All Def Affirm	36	2	36				
	All Def Affirm	36	22	36				
	All Def Affirm	37	3	37				
	All Def Affirm	37	11	37				
	All Def Affirm	41	12	41				
	All Def Affirm	42	12	42				
	All Def Affirm	†	_					
	All Def Affirm	42	3	42				
	All Def Affirm	42	15 10	42 46				
	All Def Affirm	45 46	8	46				
	All Def Affirm			46				
	All Def Affirm	46	21	46				
	All Def Affirm	47	1					
	All Def Affirm	47	22	47				
	All Def Affirm	50	24	50				
		51	5	51				
	All Def Affirm	51	20	52				
	All Def Affirm	52	21	54				
	All Def Affirm	56	15	57				
	All Def Affirm	58	1	58				
	All Def Affirm	59	1	59				
	All Def Affirm	60	1	60				
	All Def Affirm	61	1	62				
	McKesson Affirm	63	5	63				
2/28/2019	CAH Affirm	63	5	63				

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KYLE J. WRIGHT								
DEPO DATE	DESIGNATION TYPE							
		Begin Page at	Begin Line at	End Page at	End Line at			
2/28/2019	McKesson Affirm	63	16	63				
2/28/2019	CAH Affirm	63	16	63				
2/28/2019	McKesson Affirm	63	22	64				
2/28/2019	CAH Affirm	63	22	64				
2/28/2019	All Def Affirm	65	19	66				
	All Def Affirm	67	4	67				
	All Def Affirm	67	14	67				
	All Def Affirm	68	22	68				
	All Def Affirm	69	1	69				
	All Def Affirm	69	18	70				
	Manu Affirm	70	2	72				
	All Def Affirm	70	8	70	:			
	All Def Affirm	70	13	70				
	All Def Affirm	70	24	70				
	All Def Affirm	71	1	71				
	All Def Affirm	72	1	72	•			
	All Def Affirm	72	10	72				
	All Def Affirm	72	16	72				
	All Def Affirm	72	18	72				
	All Def Affirm	72	24	72				
	All Def Affirm	73		73				
	All Def Affirm	73		73				
	All Def Affirm	74		74				
	All Def Affirm	74	10	74				
	All Def Affirm	74		74				
	Manu Affirm		19	75				
	All Def Affirm	75 75	2	75				
	Manu Affirm	†						
	All Def Affirm	75	7	75				
	All Def Affirm	75	7	75				
	All Def Affirm	75	11	75				
		75	17	75				
	All Def Affirm	75	22	76				
	All Def Affirm	76	14	77				
	Manu Affirm	76	16	77				
	Manu Affirm	77	6	77				
	All Def Affirm	77	6	77				
	Manu Affirm	77	18	77				
	All Def Affirm	77	18	77				
	Manu Affirm	78	2	78				
	All Def Affirm	78	2	78				
	All Def Affirm	80	12	80				
	All Def Affirm	80	17	80				
	All Def Affirm	80	24	81				
	All Def Affirm	81	23	82				
	All Def Affirm	82	12	82				
2/28/2019	All Def Affirm	82	19	82				

	DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KYLE J. WRIGHT								
DEPO DATE	DESIGNATION TYPE		TIVE DESIGNATIONS						
		Begin Page at	Begin Line at	End Page at	End Line at				
2/28/2019	McKesson Affirm	83	16	83					
2/28/2019	Pharm Affirm	83	16	83					
2/28/2019	CAH Affirm	83	16	83					
2/28/2019	McKesson Affirm	83	22	83					
2/28/2019	Pharm Affirm	83	22	83					
2/28/2019	CAH Affirm	83	22	83					
2/28/2019	McKesson Affirm	84	5	84					
	Pharm Affirm	84	5	84					
	CAH Affirm	84	5	84					
	Manu Affirm	84	9	84					
	McKesson Affirm	84	21	84					
	Manu Affirm	84	21	84					
	Pharm Affirm	84	21	84					
	CAH Affirm	84	21	84					
	CAH Affirm	85	13	85					
	McKesson Affirm	85	13	85					
	McKesson Affirm	86	1	86					
	All Def Affirm	86	15	86					
	All Def Affirm	86	20	87					
	All Def Affirm	88	1	88					
	All Def Affirm	88	9	88					
	All Def Affirm	88	13	88					
	McKesson Affirm	89	2	89					
	All Def Affirm	89	17	90					
	All Def Affirm	90	17	91					
	All Def Affirm	92	7	93					
	McKesson Affirm	94	17	94					
	All Def Affirm	94	22	97					
	All Def Affirm	97	15	97					
	All Def Affirm	98	14	98					
	All Def Affirm	98	22	99					
	All Def Affirm	99	5	99					
	All Def Affirm	99	24	100					
	All Def Affirm	100	25	101					
	All Def Affirm	102	1	102					
	All Def Affirm	102	10	102					
	All Def Affirm	102	18	103					
	All Def Affirm	103	10	103					
	All Def Affirm	103	13	103					
	McKesson Affirm	103	6	106					
	Pharm Affirm	106	6	106					
	CAH Affirm								
		106	6	106					
	McKesson Affirm	106	11	106					
	Pharm Affirm	106	11	106					
	CAH Affirm McKesson Affirm	106 106	11 20	106 106					

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KYLE J. WRIGHT							
DEPO DATE DESIGNATION DEFENDANTS' AFFIRMATIVE DESIGNATIONS							
	TYPE	_					
		Begin Page at	Begin Line at	End Page at	End Line at		
2/28/2019	All Def Affirm	108	16	108	1		
2/28/2019	All Def Affirm	108	21	108	2		
2/28/2019	All Def Affirm	110	8	110	1		
2/28/2019	All Def Affirm	110	15	110	1		
2/28/2019	All Def Affirm	113	23	114			
2/28/2019	All Def Affirm	114	16	114	1		
	All Def Affirm	114	19	114	2		
	All Def Affirm	115	2	115	1		
2/28/2019	CAH Affirm	115	11	115	1		
	McKesson Affirm	115	11	115	1		
	All Def Affirm	115	17	115	2		
	All Def Affirm	115	24	116			
	McKesson Affirm	117	13	117			
	McKesson Affirm	117	19	119			
	All Def Affirm	119	23	120			
	All Def Affirm	120	10	121			
	All Def Affirm	121	3	121			
	All Def Affirm	121	7	121	2		
	All Def Affirm	122	1	123			
	All Def Affirm	123	9	123	2		
	All Def Affirm	123	25	124			
	All Def Affirm	124	7	124			
	All Def Affirm	125	5	125			
	All Def Affirm	125	20	125	2		
	All Def Affirm	125	25	126			
	All Def Affirm	128	1	128			
	All Def Affirm	128	10	128	1		
	All Def Affirm	128	19	128	2		
	All Def Affirm	129	1	129			
	All Def Affirm	129	22	129			
	McKesson Affirm	131	5	131			
	McKesson Affirm	131	6	131			
	All Def Affirm	132	3	132	1		
	All Def Affirm	132	16	132	2		
	All Def Affirm	132	24	133	2		
	All Def Affirm	133	4	133			
	McKesson Affirm	134	6	134	1		
	Pharm Affirm	134	6	134			
	McKesson Affirm		13	135	1		
	Pharm Affirm	134 134	13	135			
	All Def Affirm		7				
	All Def Affirm	135		135			
		135	15	135			
	All Def Affirm	136	1	136	:		
	All Def Affirm	137	1	137			
2/28/2019	All Def Affirm All Def Affirm	140 140	2 10	140 140			

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KYLE J. WRIGHT								
DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS						
	Begin Page at	Begin Line at	End Page at	End Line at				
2/28/2019	All Def Affirm	141	2	141				
	All Def Affirm	141	14	141				
	All Def Affirm	142	2	142				
2/28/2019	Manu Affirm	142	13	142				
	All Def Affirm	142	16	142				
	Manu Affirm	142	25	142				
	All Def Affirm	142	25	142				
	All Def Affirm	143	2	143				
	All Def Affirm	143	12	143				
	All Def Affirm	143	19	144				
	All Def Affirm	144	14	144				
	All Def Affirm	145	10	145				
	All Def Affirm	145	23	145				
	All Def Affirm	146	1	147				
	All Def Affirm	147	5	147				
	All Def Affirm	147	15	147				
	All Def Affirm	148	9	148				
	All Def Affirm	148	15	148				
	All Def Affirm	148	24	149				
	All Def Affirm	149	5	149				
	All Def Affirm	149	12	149				
	All Def Affirm	150	9	150				
	McKesson Affirm	150	20	150				
	McKesson Affirm	151	1	151				
	McKesson Affirm	151	3	151				
	McKesson Affirm	151	8	151				
	All Def Affirm	151	23	151				
	All Def Affirm	152	1	152				
	All Def Affirm	153	2	153				
	All Def Affirm	153	19	153				
	All Def Affirm	153	21	153				
	All Def Affirm	153	24	153				
	All Def Affirm	154	1	154				
	All Def Affirm	154	8	154				
	All Def Affirm	154	18	154				
	All Def Affirm	154	12	159				
	All Def Affirm	160	12	160				
	All Def Affirm	162	23	162				
	Manu Affirm	162	23	163				
	All Def Affirm	163	1	163				
	Manu Affirm		7					
		163		163				
	Manu Affirm	164	1	164				
	Manu Affirm	164	7	164				
	All Def Affirm	164	11	164				
	All Def Affirm Manu Affirm	164 164	15 15	164 164				

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KYLE J. WRIGHT								
DEPO DATE	DESIGNATION TYPE	X122 3. V						
		Begin Page at	Begin Line at	End Page at	End Line at			
2/28/2019	All Def Affirm	164	22	165				
2/28/2019	Manu Affirm	164	22	165				
	All Def Affirm	165	4	165				
	Manu Affirm	165	4	165				
	All Def Affirm	165	17	165				
	Manu Affirm	165	17	165				
	Manu Affirm	166	2	166				
	All Def Affirm	167	13	167				
	All Def Affirm	167	18	167				
	All Def Affirm	167	21	167				
	All Def Affirm	168	1	168				
	All Def Affirm	168	19	168				
	Manu Affirm	170	2	170				
	All Def Affirm	170	2	170				
	McKesson Affirm	171	18	172				
	All Def Affirm	172	10	172				
	All Def Affirm	172	23	172				
	All Def Affirm	173	1	173				
	All Def Affirm	173	10	173				
	All Def Affirm	174	10	174				
	All Def Affirm	174	19	174				
	All Def Affirm	174	24	175				
	All Def Affirm	179	8	179				
	All Def Affirm	180	1	180				
	All Def Affirm	180	21	180				
	All Def Affirm	181	1	181				
	All Def Affirm	181	18	181				
	All Def Affirm	182	18	182				
	All Def Affirm	182	7					
	Manu Affirm	1		182				
	All Def Affirm	182	11 19	182 183				
	Manu Affirm	182 182	19	183				
	All Def Affirm			183				
	Manu Affirm	183	5	183				
	Manu Affirm	183						
	Manu Affirm	184	11	184				
		184	17	184				
	Manu Affirm	184	20	184				
	All Def Affirm	184	22	184				
	All Def Affirm	185	1	185				
	All Def Affirm	185	14	185				
	All Def Affirm	185	23	185				
	All Def Affirm	186	13	186				
	All Def Affirm	187	1	187				
	All Def Affirm	187	14	187				
	All Def Affirm	187	25	187				
2/28/2019	All Def Affirm	191	13	191				

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KYLE J. WRIGHT							
DEPO DATE	DESIGNATION TYPE	KILL J. W					
		Begin Page at	Begin Line at	End Page at	End Line at		
2/28/2019	All Def Affirm	191	20	191			
	All Def Affirm	192	1	192			
	Manu Affirm	192	1	192			
	Manu Affirm	193	5	193			
	Manu & Dist Affirm	193	5	193			
	Manu & Dist Affirm	193	15	194			
	Manu & Dist Affirm	194	8	194			
	Manu & Dist Affirm	194	13	194			
	Manu Affirm	195	3	195			
	Manu Affirm	195	10	195			
	All Def Affirm	195	22	195			
	All Def Affirm	196	3	196			
	Manu Affirm	196	3	196	<u> </u>		
	All Def Affirm	196	15	196			
	Manu Affirm	196	15	196			
	Manu Affirm	196	23	198			
	All Def Affirm	197	6	197			
	All Def Affirm	198	1	198			
	All Def Affirm	198	6	198			
	Manu Affirm	198	6	198			
	All Def Affirm	198	17	199			
	Manu Affirm	198	17	199			
	All Def Affirm	199	5	199			
	Manu Affirm	199	5	199			
	Manu Affirm	201	24	202			
	All Def Affirm	202	1	202			
	All Def Affirm	202	10	202			
	All Def Affirm	202	24	202			
	Pharm Affirm	208	5	208			
	Pharm Affirm	208	10	208			
	Pharm Affirm	208	14	208			
	Pharm Affirm	208	22	208			
	Manu Affirm	208	25	209			
	All Def Affirm	209	2	209			
	All Def Affirm	209		209			
	All Def Affirm		8	209			
	Manu Affirm	209	13				
	All Def Affirm	209 210	13 19	209 210			
	Manu Affirm						
	All Def Affirm	210	19	210			
		211	1	211			
	All Def Affirm	211	12	212			
	Manu Affirm	212	1	212			
	Manu Affirm	212	11	212			
	All Def Affirm	212	11	212			
	Manu Affirm	212	18	213			
2/28/2019	All Def Affirm	213	1	213			

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KYLE J. WRIGHT								
DEPO DATE DESIGNATION DEFENDANTS' AFFIRMATIVE DESIGNATIONS								
	TYPE							
		Begin Page at	Begin Line at	End Page at	End Line at			
2/28/2019	All Def Affirm	214	12	214	2			
	All Def Affirm	215	6	215	1			
	All Def Affirm	215	18	216	1			
	All Def Affirm	216	12	216	2			
	All Def Affirm	217	5	217	2			
	Manu Affirm	217	5	217	2			
	All Def Affirm	218	17	218	1			
	Manu Affirm	218	17	218	1			
	Manu Affirm	218	21	218	2			
	All Def Affirm	218	21	218	2			
	All Def Affirm	219	1	219				
	All Def Affirm	219	11	219	1			
	Manu Affirm	220	20	221				
	All Def Affirm	220	22	220	2			
	All Def Affirm	221	6	221	1			
	All Def Affirm	223	10	223	2			
	All Def Affirm	223	25	224	2			
	All Def Affirm	224	25	224	2			
	All Def Affirm	225	18	226				
	All Def Affirm	226	3	226				
	All Def Affirm	226	11	226	1			
	All Def Affirm	228	9	228	1			
	All Def Affirm	228	18	228				
	All Def Affirm	229	4	229				
	All Def Affirm	229	10	229				
	All Def Affirm	229	19	229				
	All Def Affirm	229	25	230	_			
	All Def Affirm	230	9	230				
	All Def Affirm	230	12	230				
	All Def Affirm	230	18	231				
	All Def Affirm	231	9	231				
	All Def Affirm	231	20	231				
	All Def Affirm	232	3	232				
	All Def Affirm	233	1	233	-			
	All Def Affirm	233	19	234				
	All Def Affirm	234	11	234				
	All Def Affirm	234	20	235				
	All Def Affirm	235	15	235				
	All Def Affirm	236	2	236				
	All Def Affirm	237	9	237				
	All Def Affirm	237	15	237				
	All Def Affirm	237	20	237	-			
	All Def Affirm	238	23	238				
	All Def Affirm	239	1	238				
	All Def Affirm	i i	3	239				
	All Def Affirm	239 240	3	239				

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR								
KYLE J. WRIGHT DEPO DATE DESIGNATION DEFENDANTS' AFFIRMATIVE DESIGNATIONS								
22.022	TYPE							
		Begin Page at	Begin Line at	End Page at	End Line at			
2/28/2019	Pharm Affirm	241	2	241				
	Pharm Affirm	241	11	241	2			
	Pharm Affirm	244	4	244				
	McKesson Affirm	244	14	244				
	McKesson Affirm	245	11	245				
	CAH Affirm	245	11	245				
	All Def Affirm	246	13	246				
	All Def Affirm	247	12	247				
	All Def Affirm	251	7	251				
	All Def Affirm	252	13	252				
	Manu Affirm	252	13	253				
	All Def Affirm	253	1	253				
	All Def Affirm	253	18	253	1			
	All Def Affirm	254	7	254	2			
	All Def Affirm	255	1	255				
	All Def Affirm	255	9	255	1			
	All Def Affirm	255	21	256				
	All Def Affirm	257	2	257	1			
	McKesson Affirm	257	24	258	1			
	CAH Affirm	257	24	258				
	All Def Affirm	259	12	258	1			
	All Def Affirm	259	20	259	2			
	All Def Affirm	260	4	260	2			
	All Def Affirm		4					
	All Def Affirm	261	1	261				
	All Def Affirm	261	1	261	2			
	All Def Affirm	261	9	261	2			
	All Def Affirm	262	1	262				
		306	10	306	1			
	All Def Affirm	306	15	306	1			
	All Def Affirm	306	19	306	2			
	All Def Affirm	320	11	320	1			
	All Def Affirm	321	8	321	1			
	All Def Affirm	321	18	321	2			
	All Def Affirm	321	24	321	2			
	All Def Affirm	341	21	342				
	All Def Affirm	342	3	342				
	All Def Affirm	342	11	342	1			
	All Def Affirm	342	15	342				
	All Def Affirm	383	23	384				
	All Def Affirm	384	3	384				
	All Def Affirm	384	13	384				
	Manu Affirm	411	23	412				
	Manu Affirm	412	7	412	;			
	Manu Affirm	412	17	412	<u> </u>			
	Manu Affirm	412	24	412				
3/4/2019	Manu Affirm	413	1	413				

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KYLE J. WRIGHT							
DEPO DATE DESIGNATION DEFENDANTS' AFFIRMATIVE DESIGNATIONS							
22.022	TYPE						
		Begin Page at	Begin Line at	End Page at	End Line at		
3/4/2019	Manu Affirm	413	5	413			
	All Def Affirm	478	23	479			
	All Def Affirm	479	21	480			
	All Def Affirm	481	10	481			
	All Def Affirm	487	7	487			
	All Def Affirm	487	22	488			
	All Def Affirm	488	20	489			
	All Def Affirm	491	22	492	-		
	Manu Affirm	493	13	494			
	Pharm Affirm	493	13	494			
	Manu Affirm	494	22	496			
	All Def Affirm	496	8	496			
	All Def Affirm	496	13	496	1		
	Manu Affirm	496	13	497			
	All Def Affirm	496	23	497			
	All Def Affirm	497	4	497	1		
	Manu Affirm	497	4	497	1		
	All Def Affirm	497	17	497	2		
	All Def Affirm		8				
	All Def Affirm	498 498	23	498 500			
	All Def Affirm	500	15	500	1		
	All Def Affirm		8	501			
	McKesson Affirm	501	8	503			
	CAH Affirm	503	8	503	1		
	McKesson Affirm						
	CAH Affirm	503	19	503	2		
	All Def Affirm	503	19	503	2		
	All Def Affirm	523	5	523	1		
		523	14	523	1		
	All Def Affirm	523	22	524	1		
	All Def Affirm	524	22	524	2		
	All Def Affirm	524	22	525	1		
	All Def Affirm	524	25	525	1		
	All Def Affirm	525	14	525	2		
	All Def Affirm	526	4	526			
	All Def Affirm	526	19	527			
	All Def Affirm	527	6	527	1		
	All Def Affirm	532	19	532	2		
	All Def Affirm	533	6	533			
	McKesson Affirm	536	1	536			
	CAH Affirm	536	1	536			
	McKesson Affirm	536	5	536			
	CAH Affirm	536	5	536			
	McKesson Affirm	536	7	536			
	CAH Affirm	536	7	536			
	All Def Affirm	537	9	538			
3/4/2019	All Def Affirm	538	6	538			

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS FOR KYLE J. WRIGHT								
DEPO DATE	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS						
		Begin Page at	Begin Line at	End Page at	End Line at			
3/4/2019	All Def Affirm	538	10	538				
3/4/2019	All Def Affirm	539	5	539				
3/4/2019	McKesson Affirm	539	9	539				
3/4/2019	All Def Affirm	542	4	542				
3/4/2019	All Def Affirm	542	13	543				
3/4/2019	All Def Affirm	543	6	543				
3/4/2019	All Def Affirm	543	23	544				
3/4/2019	All Def Affirm	544	11	544				
3/4/2019	McKesson Affirm	544	13	544				
3/4/2019	CAH Affirm	544	13	544				
3/4/2019	All Def Affirm	545	8	545				
3/4/2019	All Def Affirm	545	21	546				
3/4/2019	All Def Affirm	546	11	546				
3/4/2019	All Def Affirm	546	19	546				
3/4/2019	All Def Affirm	546	23	546				
	All Def Affirm	547	3	547				
3/4/2019	All Def Affirm	550	12	550				
3/4/2019	All Def Affirm	550	25	550				
	All Def Affirm	554	11	554				
	All Def Affirm	554	25	554				

	RESPONSIVE DEPOSITION DESIGNATIONS FOR KYLE WRIGHT									
	DESIGNATION TYPE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS								
		Begin Page at	Begin Line at	End Page at	End Line at					
2/28/2019	All Def Responsive	100	6	100	24					
2/28/2019	All Def Responsive	130	11	131	25					
2/28/2019	All Def Responsive	132	1	132	2					
2/28/2019	All Def Responsive	147	19	148	3					
2/28/2019	All Def Responsive	202	23	203	1					
2/28/2019	All Def Responsive	225	8	225	19					

		PLAINTIFFS	OBJECTIONS	FOR KYLE WRIGHT
Start Page	Start Line	End Page	End Line	Note
12	4	12	5	Plaintiffs object to the extent that certain Defendant deposition designations of the DEA depositions and certain 30(b)(6) depositions are duplicative of one another.
12	6	12	7	Plaintiffs further object to any testimony by current or former DEA agents designated by the Defendants to the extent that such testimony seeks to define what the law requires or whether DefendantsÕ conduct violated or did not violate the law, as such testimony would invade the province of the jury.
12	Ь	12	/	. , , ,
20	_	F 2	25	relevance, consultant privilege, scope,
30	1	52	25	foundation, speculation
72		70	10	relevance, foundation, scope,
72	4	72	10	speculation,
72	12	73	8	relevance, foundation, scope, speculation,
				completeness, relevance, foundation,
74	1	74	24	scope, speculation
				relevance, foundation, scope,
75	2	77	6	speculation
				relevance, foundation, scope,
77	23	78	11	speculation
				duplicative/cumulative, relevance,
80	17	81	11	foundation, scope, speculation
		<u>.</u> -		relevance, foundation, scope,
81	23	82	19	speculation
63	4.5	00	22	relevance, foundation, scope,
83	16	83	23	speculation
0.4	_	0.4	24	relevance, foundation, scope, speculation
84	5	84	21	relevance, foundation, scope,
85	13	86	1	speculation
83	13	30	Т.	relevance, duplicative of other
				deposition designations, foundation,
86	25	91	16	scope, speculation
		<u> </u>	10	relevance, duplicative of other
				deposition designations, foundation,
92	7	93	22	scope, speculation
	· · · · · · · · ·			1 / 1

				asked and answered, relevance,
				duplicative of other deposition
				designations, foundation, scope,
98	14	99	6	speculation
				relevance, foundation, scope,
99	24	100	5	speculation
				improper impeachment, relevance,
100	25	102	21	foundation, scope, speculation
				relevance, foundation, scope,
102	23	103	13	speculation
				relevance, duplicative, foundation, calls
				for legal conclusion, scope, speculation,
106	6	106	22	argumentative
				relevance, foundation, calls for legal
				conclusion, scope, speculation,
108	16	109	6	argumentative
				relevance, foundation, calls for legal
				conclusion, scope, speculation,
110	8	110	19	argumentative
				relevance, foundation, calls for legal
				conclusion, scope, speculation,
113	23	116	12	argumentative
				relevance, cumulative, foundation, calls
				for legal conclusion, scope, speculation,
117	13	119	3	argumentative
				relevance, cumulative, foundation, calls
				for legal conclusion, scope, speculation,
119	23	124	7	argumentative
				relevance, cumulative, foundation, calls
				for legal conclusion, scope, speculation,
125	5	126	16	argumentative
				relevance, cumulative, foundation, calls
				for legal conclusion, scope, speculation,
127	1	129	22	argumentative
				improper impeachment, relevance,
131	5	133	11	foundation, scope, speculation
				relevance, duplicative, foundation, calls
				for legal conclusion, scope, speculation,
134	6	137	7	argumentative
				relevance, duplicative, foundation,
				improper use of document, scope,
140	2	142	25	speculation, argumentative
				relevance, duplicative, foundation, calls
				for legal conclusion, scope, speculation,
143	2	143	12	argumentative
				<u> </u>

				relevance, duplicative, foundation, calls
				for legal conclusion, scope, speculation,
143	19	147	18	argumentative
				improper impeachment, relevance,
148	9	149	12	foundation, scope, speculation
				relevance, duplicative, foundation,
150	9	151	8	scope, speculative, argumentative
				relevance, duplicative, foundation, calls
				for legal conclusion, scope, speculation,
151	23	152	8	argumentative
				relevance, duplicative, foundation, calls
				for legal conclusion, scope, speculation,
153	19	154	19	argumentative
				relevance, duplicative, foundation, calls
				for legal conclusion, scope, speculation,
159	12	160	5	argumentative
162	23	163		relevance
102	23	103	,	relevance, duplicative, foundation,
164	1	166	20	improper hypothetical, scope
104	1	100	20	Improper hypothetical, scope
167	13	160	21	seens relevance speculative foundation
167	13	168	21	scope, relevance, speculative, foundation
				asked and answered, relevance,
				duplicative of other deposition
4=0		4-0		designations, foundation, scope,
170	2	170	20	speculation
				asked and answered, relevance,
				duplicative of other deposition
				designations, foundation, scope,
171	18	172	1	speculation
				relevance, cumulative, foundation, calls
				for legal conclusion, scope, speculation,
172	10	172	23	argumentative
				relevance, cumulative, foundation, calls
				for legal conclusion, scope, speculation,
172	23	175	10	argumentative
179	8	181		relevance, scope, speculative
181	18	182		relevance, scope, speculative
182	7	183		relevance, scope, speculative
				relevance, cumulative, foundation, calls
				for legal conclusion, scope, speculation,
184	11	185	23	argumentative
104		103		relevance, cumulative, foundation, calls
				for legal conclusion, scope, speculation,
186	13	187) [argumentative
100	13	10/	25	
				relevance, cumulative, foundation, calls
400	4.0	400	35	for legal conclusion, scope, speculation,
189	16	189	25	argumentative

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236	2	236	5	relevance
237	9	239	5	relevance, calls for expert testimony
245	11	245	16	relevance, argumentative, speculative
247	12	247	24	relevance, argumentative, speculative
255	4	256		cumulative, relevance, scope, speculatve
259	12	259	17	calls for legal conclusion
261	2	262	4	relevance, speculative
				Plaintiffs object to the extent that
				certain Defendant deposition
				designations of the DEA depositions and
				certain 30(b)(6) depositions are
278	4	278	4	duplicative of one another.
				Plaintiffs further object to any testimony
				by current or former DEA agents
				designated by the Defendants to the
				extent that such testimony seeks to
				define what the law requires or whether
				DefendantsÕ conduct violated or did not
				violate the law, as such testimony would
278	5	278	5	invade the province of the jury.
478	23	479		relevance, cumulative
170	23	173	10	relevance, camalative
479	21	480	10	relevance, cumulative, argumentative
473		700		relevance, camalative, algamentative
481	10	481	17	relevance, cumulative, argumentative
401	10	701		relevance, camalative, algamentative
				asked and answered, argumentative,
487	7	487	22	cumulative, relevance
488	16	289		speculative, cumulative, relevance
491	22	492		relevance, cumulative
471	22	472	4	calls for legal confusion, relevance,
496	8	497	15	speculative
490	1	497		relevance
501	4	501		relevance
301	4	301	8	cumulative, misstates prior testimony,
F03	0	F03	20	
503	8	503	20	relevance

5	527	13	improper questioning based on improper use of transcript, argumentative, completeness, improper impeachment, relevance, scope
19	533	6	asked and answered, argumentative, cumulative, relevance
1	528	19	asked and answered, argumentative, cumulative, relevance
5			relevance, cumulative, argumentative scope, relevance
7	547		scope, relevance, argumentative
12			relevance, cumulative, argumentative, scope, speculative scope, relevance, argumentative
	19 1 5 4 7	19 533 1 528 5 539 4 543 7 547 12 550	19 533 6 1 528 19 5 539 16 4 543 11 7 547 8 12 550 25

Responses FOR KYLE WRIGHT							
DEPO DATE		NOTES					
	Begin Page at	Begin	End	End	NOTES		
		Line at	Page at	Line at			
					RESPONSE: Consultant Privilege: Does not apply. Existence and terms of consulting		
					agreement are not privileged. Relevance: Relevant to credibility and potential bias.		
					Scope: Touhy authorization does not apply to questions that do not relate to		
					information he learned while working for DEA. Speculation and Foundation: The		
					objection covers 22 transcript pages, so it is unclear what Q&A this objection relates to. Questions about Mr. Wright's consulting agreement with plaintiffs do not require		
2/28/2019	30	1	53	25	him to speculate and do not require additional foundation. See Responses 2 and 4.		
2/28/2019	72	4	72		RESPONSE: See Responses 1, 2, and 3.		
2/28/2019	72	12	73		RESPONSE: See Responses 1, 2, and 3.		
2/28/2019	74	1	74		RESPONSE: Will withdraw designation of 74:1.		
2/28/2019	75	2	78		RESPONSE: See Responses 1, 2, and 3.		
2/28/2019	77	23	78	11	RESPONSE: See Responses 1, 2, and 3.		
2/28/2019	80	17	81	11	RESPONSE: See Responses 1, 2, and 3.		
2/28/2019	81	23	82	19	RESPONSE: See Responses 1, 2, and 3.		
2/28/2019	83	16	83	23	RESPONSE: See Responses 1, 2, and 3.		
2/28/2019	84	5	84	21	RESPONSE: See Responses 1, 2, and 3.		
. / /					RESPONSE: See Responses 1, 2, and 3. Objection includes testimony that was not		
2/28/2019	85	13	86		designated by defendants.		
2/28/2019	86	25	91		RESPONSE: See Responses 1, 2, 3, and 5.		
2/28/2019	92	7	93	22	RESPONSE: See Responses 1, 2, 3, and 5. RESPONSE: See Responses 1, 2, 3, and 5. Not asked and answered witness's prior		
2/28/2019	98	14	99	6	answer was not clear.		
2/28/2019	99	24	100		RESPONSE: See Responses 1, 2, and 3.		
, ,					RESPONSE: Impaches testimony at 99:24-100:5. Designated 100:6-24 to provide full		
2/28/2019	100	25	102	21	context. See Responses 1, 2, and 3.		
2/28/2019	102	23	103		RESPONSE: See Responses 1, 2, and 3.		
2/28/2019	106	6	106		RESPONSE: See Responses 1, 2, 3, 5, 6, and 9.		
2/28/2019	108	16	109		RESPONSE: Objection includes testimony that was not designated. See Responses 1, 2, 3, 6, and 9.		
2/28/2019	110	8	110		RESPONSE: See Responses 1, 2, 3, 6, and 9.		
2/28/2019	113	23			RESPONSE: See Responses 1, 2, 3, 6, and 9.		
2,20,2013	113		110		NEST ONDER SECTION POINTS IN 19 OF WIND ST		
2/28/2019	117	13	119	3	RESPONSE: Testimony not designated by defendants. See Responses 1, 2, 3, 6, and 9.		
2/28/2019	119	23	124	7	RESPONSE: See Responses 1, 2, 3, 5, 6, and 9.		
2/28/2019	125	5	126	16	RESPONSE: See Responses 1, 2, 3, 5, 6, and 9.		
2/28/2010	127	1	120	22	RESPONSE: Objection includes testimony not designated by defendants. See Responses 1, 2, 3, 5, 6, and 9.		
2/28/2019	127	1	129		RESPONSE: Proper impeachment witness's answer to previous question		
					contradicted prior answer. Additional designation provides context for impeachment.		
2/28/2019	131	5	133		See Responses 1, 2, and 3.		
2/28/2019	134	6	137	7	RESPONSE: See Responses 1, 2, 3, 5, 6, and 9.		
2/20/2010	140	3	1.13	זר	RESPONSE: See Responses 1, 2, 3, 5, and 9. Proper use of document to refresh		
2/28/2019	140	2	142 143		witness's recollection.		
2/28/2019 2/28/2019	143 143	19	143		RESPONSE: See Responses 1, 2, 3, 6, and 9. RESPONSE: See Responses 1, 2, 3, 5, 6, and 9.		
2/20/2019	143	19	14/	10	RESPONSE: See Responses 1, 2, 3, 3, 6, and 9. RESPONSE: See Responses 1, 2, and 3. Not improper impeachment witness's		
					previous answer contradicted prior testimony where he mentioned a court		
2/28/2019	148	9	149		appearance and comments from a judge.		
2/28/2019	150	9	151	8	RESPONSE: See Responses 1, 2, 3, 5, and 9.		

	I		Ī		RESPONSE: See Responses 1, 2, 3, and 5. Does not call for a legal conclusion no
2/28/2019	151	23	152		question from defense counsel in this excerpt. See Response 9.
2/28/2019	153	21	154		RESPONSE: See Responses 1, 2, 3, 5, and 6. See Response 9.
2/20/2013	133	21	134		RESPONSE: See Responses 1, 2, 3, and 5. Asking a witness to identify a document
2/28/2019	159	12	160		does not "call for a legal conclusion." See Response 9.
					RESPONSE: See Response 1. Exhibit reflects witness's contemporaneous
					understanding prior to this litigation of suspicious order monitoring, the central
2/28/2019	162	23	163	7	issue of this litigation. That is clearly relevant.
					RESPONSE: See Responses 1, 2, 3, and 5. Exhibit reflects witness's contemporaneous
					understanding prior to this litigation of suspicious order monitoring, the central
					issue of this litigation. That is clearly relevant. Plaintiffs' objection covers multiple
					transcript pages with many questions. Insofar as plaintiffs believe that a question is
					an "improper hypothetical," plaintiffs must identify that specific question so
2/28/2019	164	1	166		defendants can respond.
2/28/2019	167	13	168		RESPONSE: See Responses 1, 2, and 3.
2/22/2242	470		470		RESPONSE: See Responses 1, 2, 3, and 5. Not asked and answered witness's prior
2/28/2019	170	2	170	20	answer was unclear.
					RESPONSE: See Responses 1, 2, 3, and 5. Not asked and answered prior testimony
2/28/2019	171	18	172		was limited to specific context of distributor briefings; this question is not.
2/28/2019	172	10	172		RESPONSE: See Responses 1, 2, 3, 5, 6, and 9.
2/28/2019	172	23	175		RESPONSE: See Responses 1, 2, 3, 5, 6, and 9.
2/28/2019	179	8	181		RESPONSE: See Responses 1, 2, and 3.
2/28/2019	181	18	182		RESPONSE: See Responses 1, 2, and 3.
2/28/2019	182	7	183		RESPONSE: See Responses 1, 2, and 3.
2/28/2019	184	11	185		RESPONSE: See Responses 1, 2, 3, 5, 6, and 9.
2/28/2019	186	13	187		RESPONSE: See Responses 1, 2, 3, 5, 6, and 9.
2/28/2019	189	16	189		RESPONSE: Testimony not designated.
2/28/2019	191	13	191		RESPONSE: See Responses 1, 2, 3, 5, 6, and 9.
2/28/2019	193	11	191		RESPONSE: See Responses 1, 2, 3, 5, 6, and 9.
1		3			·
2/28/2019	195	3	199		RESPONSE: See Responses 1, 2, 3, 5, 6, and 9. RESPONSE: See Response 1. Question refers to a central concept in plaintiffs' SOM-
2/28/2019	201	24	202		related allegations against manufacturers.
2/28/2019	202	24	202		RESPONSE: Remainder of Q&A inadvertently omitted.
2/28/2019	208	5	208		RESPONSE: See Responses 1, 2, 3, 5, 6, and 9.
2/28/2019	211	9	211		RESPONSE: See Responses 1, 2, and 3.
2/28/2019	212	4	213		RESPONSE: See Responses 1, 2, and 3.
2/28/2019	214	12	215	•	RESPONSE: See Responses 2 and 5.
2/28/2019	217	4	217		RESPONSE: See Responses 1 and 5.
2/28/2019	218	17	219		RESPONSE: See Responses 1, 2, 3, and 5.
2/28/2019	220	20	221		RESPONSE: See Responses 1, 2, 3, and 5.
					RESPONSE: See Responses 1, 2, 3, and 5.
2/28/2019	223	10	224		RESPONSE: Question inadvertently omitted. Added designation to correct.
2/28/2019	225	18	225		RESPONSE: See Responses 1, 2, 3, and 5. Calls for witnesses's personal knowledge
2/28/2019	225	24	226		not expert testimony.
2/28/2019	228	9	228		RESPONSE: Responses 1, 2, 3, 5, and 7.
2,20,2013	220	3	220		RESPONSES: See Responses 1, 2, 3, 5, and 7. Not a proper 602 objection because
2/28/2019	229	4	230		witness question was prefaced with "to your knowledge."
					RESPONSE: See Responses 1, 2, and 3. Not improper hypothetical asks question
2/28/2019	231	15	232		based on witness's personal experience.
2/20/2242	255	4.5	22.		RESPONSE: See Responses 1, 2, and 3. Not an improper hypothetical asks questions
2/28/2019	233	19	234		based on witness's personal experience.
2/28/2019	235	10	235	13	RESPONSE: See Responses 1, 2, 3, and 5.

2/28/2019	236	2	236	5	RESPONSE: Relevant to causation.
2/28/2019	237	9	239	5	RESPONSE: Will withdraw.
2/28/2019	245	11	245	16	RESPONSE: See Responses 1, 3, and 9.
2/28/2019	247	12	247	24	RESPONSE: See Responses 1, 3, and 9.
2/28/2019	255	4	256	8	RESPONSE: See Responses 1, 2, 3, and 5.
					RESPONSE: Does not call for a legal conclusion asks for answer based on personal
2/28/2019	259	12	259		experience at DEA.
2/28/2019	261	2	262	4	RESPONSE: See Responses 1 and 2.
3/4/2019					RESPONSE: Relevant to credibility and bias. Not cumulative first time this topic was
	478	23	479		addressed.
3/4/2019					RESPONSE: Relevant to credibility and bias. Not cumulative first time this topic was
2/4/2242	479	21	480		addressed. See Response 9.
3/4/2019	401	10	401		RESPONSE: Relevant to credibility and bias. Not cumulative first time this topic was
2/4/2010	481	10	481		addressed. See Response 9.
3/4/2019	487	7	487		RESPONSE: See Responses 1, 5, and 9.
3/4/2019	488	16	489		RESPONSE: See Responses 1, 2, and 5.
3/4/2019	491	22	492		RESPONSE: See Responses 1 and 5.
3/4/2019	496	8	497	14	RESPONSE: See Responses 1, 2, and 6.
3/4/2019	499	1	499	3	RESPONSE: Relevant to credibility and bias.
3/4/2019	501	4	501	·	RESPONSE: See Response 1.
3/4/2019					RESPONSE: See Responses 1 and 5. Does not misstate testimony witness agreed
	503	8	503	20	the question reflected "exactly what [he] said."
3/4/2019					RESPONSE: See Responses 1, 5, and 9. Objection covers over 4 pages, not all of which
					involve questioning based on a transcript. Plaintiffs must identified specific questions
					to allow defendants to respond. Proper impeachment witness initially gave answer
	522	4	527		inconsistent with prior testimony under oath.
3/4/2019	523	4	527	13	RESPONSE: Relevant to credibility and bias. See Responses 5 and 9.
	532	19	533		, , , , , , , , , , , , , , , , , , , ,
3/4/2019	536	1	538		RESPONSE: See Responses 1,5, and 9.
3/4/2019	539	5	539		RESPONSE: Relevant to causation. See Responses 5 and 9.
3/4/2019	542	4	543		RESPONSE: Relevant to causation. See Response 3.
3/4/2019	544	7	547		RESPONSE: See Responses 1, 2, 3, and 9. Relevant to causation.
3/4/2019	550	12	550	25	RESPONSE: See Responses 2, 3, 5, and 9. Relevant to causation.
3/4/2019	554	11	554	25	Relevant to causation. See Responses 3 and 9.

RESPONSE KEY FOR KYLE WRIGHT

- 1) Relevance: Testimony is relevant to DEA's policy on suspicious order monitoring and reporting, which are central issues in this case. The Court expressly held that DEA's interpretation and enforcement of the suspicious order monitoring regulation—including "whether DEA investigators view [monthly ILRs and Excessive Order Reports] as compliant with the CSA," whether DEA accepted certain defendants' reporting as compliant, whether "DEA imposed a no-ship requirement," and whether DEA changed its interpretation of the law are "material facts in dispute that must be resolved by a jury. See Order and Opinion Regarding Plaintiffs' Summary Judgment Motions Addressing the Controlled Substances Act [Dkt. # 2483], at 28–29. Testimony is also relevant to scienter, an element of each of plaintiffs' claims and a requirement for punitive damages.
- 2) Does Not Lack Foundation/Call for Speculation: Question asks for the witness's personal understanding of DEA's suspicious order reporting policy and guidance, which he developed during his career at DEA. Witness testified extensively about his personal experience reviewing excessive purchase reports, providing guidance to registrants about DEA's suspicious order reporting expectations, investigating excessive purchase and/or suspicious order reports, and analyzing registrants' transaction data using ARCOS and other tools.
- 3) Not Outside Scope Covered by Touhy: Covered by DOJ's authorization of the witness's testimony regarding "Your general duties in your various positions held in DEA"; "Your personal recollection of your practices and procedures relating to ARCOS data and suspicious order reports"; and "Your personal recollection regarding 'DEA's interpretation and enforcement of, and practices related to 21 U.S.C. § 823 and 21 C.F.R. § 1301.74' to the extent covered by the foregoing authorized specific topics." See Letter from A. Dustin to K. Wright (Dec. 10, 2018) [Dkt. No. 1176-4].
- 4) Not Outside Scope Touhy Does Not Apply: Scope objection does not apply. Touhy authorization is not required for questions relating to information learned outside of Mr. Wright's employment with DEA.
- 5) Not Duplicative/Cumulative: Testimony is not duplicative or cumulative of other designations from Mr. Wright's testimony. Nor is Mr. Wright's testimony duplicative or cumulative of any other DEA witness. His specific career path having been a Diversion Investigator through 1995, while Excessive Purchase Reports were standard practice, then moving to headquarters and participating in the Distributor Initiative and DEA's change in SOM policy gives him a different perspective on the central issues of this case than the other DEA fact witnesses. In addition, to the extent multiple DEA witnesses testified along similar lines on the issues central to this case, that is relevant to show that those witnesses shared a common understanding of DEA's interpretation and enforcement of the suspicious order monitoring regulation, rather than an outlier view, which is, in turn, relevant to defendants' scienter.

- 6) Does Not Call for a Legal Conclusion: Question relates to how DEA interpreted and enforced the CSA and 21 C.F.R. § 1301.74(b), which are questions of fact to be decided by the jury. See Order and Opinion Regarding Plaintiffs' Summary Judgment Motions Addressing the Controlled Substances Act [Dkt. # 2483], at 28–29.
- 7) Does Not Call for Expert Testimony: Asks for witness's personal knowledge and experience based on his career at DEA.
- 8) Not Vague.
- 9) Not Argumentative."